

REMARKS

This Amendment is being filed in response to the Final Office Action mailed on November 26, 2008 which has been reviewed and carefully considered. Entry of the present amendment and allowance of the present application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 1-2 and 4-17 remain in this application, where claim 2 has been canceled without prejudice and its features included in independent claims 1 and 12.

In the Final Office Action, claim 16 is rejected under 35 U.S.C. §112, second paragraph as allegedly indefinite. In response, claim 16 has been amended to remove the alleged informalities noted in the Office Action. It is respectfully submitted that the rejection of claim 16 has been overcome and an indication as such is respectfully requested.

In the Final Office Action, claims 1-4, 6-7, 9 and 12-17 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over WO 03/079449 (Childs) in view of U.S. Patent No. 6,226,171 (Beilin). It is believed that the reference to 35 U.S.C. §102(b) on page 3, line 1 of the Final Office Action is incorrect and is assumed to be 35 U.S.C. §103(a). Clarification is respectfully requested.

Further, claim 5 is rejected under 35 U.S.C. 103(a) as allegedly unpatentable over Childs in view of U.S. Patent No. 6,952,490 (Lee) and U.S. Patent Application Publication No. 2005/0057151 (Kuwabara). Claims 8 and 10 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Childs. Claim 11 is rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Childs in view of U.S. Patent No. 6,873,091 (Bechtel). It is respectfully submitted that claims 1-2 and 4-17 are patentable over Childs, Beilin, Lee Kuwabara and Bechtel for at least the following reasons.

Childs is directed to a display device having barriers 210 between neighboring pixels 200. As clearly shown in FIG 8, and correctly noted on page 3, third full paragraph of the Final Office Action, an upper electrode 23 does not continuously cover two adjacent barriers 210. Rather, an insulating coating 40 separates two adjacent upper electrodes 23. Beilin is cited in an attempt to remedy the deficiencies in Childs.

At the outset, it is respectfully requested that the combination of Childs and Beilin is not proper, as they are directed to different technologies. In particular, Childs is directed to a display device while Beilin is directed to power conducting substrates with high-yield integrated substrate

capacitor. There is simply no motivation for one skilled in the art of displays to combine the Childs display device with the Beilin integrated substrate capacitor.

Assuming, arguendo, that such a combination is proper, Beilin shows in FIG 4 a top electrode 40 formed over the Beilin capacitor, which also includes a bottom electrode 20. As clearly shown in FIG 4, several layers separate the top and bottom electrodes 30, 40 including a main dielectric layer 30 and a dielectric patch 24, thus insulating the top electrode 30 from the bottom electrode 40. That is, the top and bottom electrodes 30, 40 are not in any direct electrical contact, as is the case in a typical capacitor.

Further as described above, FIG 8 of Childs shows that two adjacent conductive barriers 210 are also not in any direct electrical contact, as an insulating coating 40 separates the Childs barriers 210 from the upper electrodes 23. In addition, as correctly noted on page 3, first full paragraph, in FIG 8 of Childs, at best "capacitive" current reaches the barrier 240, 210, through the LED 25a. That is, similar to Beilin, two adjacent barriers in Childs not in any direct electrical contact.

In stark contrast, the present invention as recited in independent claim 1, and similarly recited in independent claim 12,

amongst other patentable elements recites (illustrative emphasis provided):

wherein said barrier structures of adjacent display pixels are in **direct** electrical contact with each other.

Barrier structures of adjacent display pixels that are in direct electrical contact with each other are nowhere disclosed or suggested in Childs. Lee Kuwabara and Bechtel are cited to allegedly show other features and do not remedy the deficiencies in Childs and Beilin.

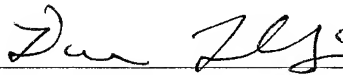
Accordingly, it is respectfully requested that independent claims 1 and 12 be allowed. In addition, it is respectfully submitted that claims 2, 4-11 and 13-17 should also be allowed at least based on their dependence from independent claims 1 and 12, as well as their individually patentable elements.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of

the Examiner's statements are conceded.

In view of the above, it is respectfully submitted that the present application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

Respectfully submitted,

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